

Kristi Cahoon Kelly

From: Andrew Guzzo
Sent: Wednesday, September 26, 2012 9:26 PM
To: Ramana, Anand V.; Pumphrey, Brian E.
Cc: Kristi Cahoon Kelly; lenbennett@clalegal.com; Suzie Rotkis; Vicki Ward
Subject: September 26, 2012 Meet and Confer

Anand,

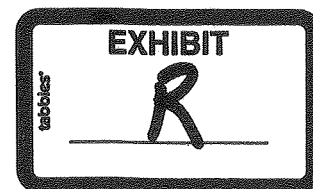
I am writing to memorialize the agreements reached today regarding Bank of America's discovery responses. If I have misstated or omitted anything, please let me know. Otherwise, please send me a response confirming the details below. Also, as you indicated, please send a follow-up e-mail tomorrow detailing when you will supplement the responses. Finally, please let me know if you have reconsidered your position on any of your objections not withdrawn as detailed below.

Interrogatories:

- BOA has withdrawn its general objections.
- Interrogatory #1 – Plaintiffs will withdraw
- Interrogatory #2 – BOA will withdraw your vagueness objection; BOA will provide the Metro II Data, but will not provide contact information.
- Interrogatory #3 – BOA will supplement response to comply with Rule 33(d), but will not withdraw objections.
- Interrogatory #4 – BOA will supplement with more detail.
- Interrogatory #5 – BOA will not provide contact information of the BOA employees.
- Interrogatory #7 – BOA will provide (to the extent they exist) any training manuals for any BOA employees identified in the interrogatories.
- Interrogatory #9 – BOA will not provide this information absent court order.
- Interrogatory #10 – the scope has been narrowed from January 1, 2008 through the present, and we of course are not seeking any documents exchange between your firm and BOA after this case was filed. You will produce responsive documents (to the extent they exist).
- Interrogatory #11 – you will provide Metro II data as allowed by Federal Rule 33(d).

Requests for Production:

- General Objections are withdrawn.
- RFP#2 – BOA will not produce without court order.
- RFP #3 – Plaintiff has agreed to limit from January 1, 2008, through present. BOA will produce responsive documents (to the extent they exist) such as Metro II Data, and bulletins/manuals etc. about policies on reporting during modification.
- RFP#4 – BOA will not produce.
- RFP #5 – Plaintiffs have withdrawn this request.



- RFP #9 – BOA will not withdraw objection, but will produce (to the extent they exist).
- RFP #10 – BOA will not withdraw objection.
- RFP #11 – BOA will produce if you have them, but will not withdraw objection.
- RFP # 12 - scope has been narrowed from January 1, 2008, through present, and only pertaining to E-Oscar. BOA will produce (to the extent they exist).
- RFP #13 – scope has been narrowed from January 1, 2008, through present. BOA will produce responsive documents (to the extent they exist) subscriber agreements and instruction materials with your client and produce if you have.
- RFP #14 – will not produce.
- RFP #15 – will not produce.
- RFP #18 – scope has been narrowed to affidavits, depositions, etc. relating to credit reporting. BOA will produce (to the extent they exist).
- RFP #20 – will not produce.
- RFP #22 – scope has been limited to complete procedures manual for investigation (and revisions) relating to E-Oscar.
- RFP #23 – your objection was withdrawn.
- RFP #24 – you will produce responsive documents such as Credit Reporting Resource Guide (to the extent they exist).
- RFP #25 – Will be supplemented to none.
- RFP #26 – BOA will produce (to the extent they exist).
- RFP #28 – narrowed to credit reporting department. BOA will not produce.
- RFP #29 – BOA will not produce.

Thank you.

Andrew J. Guzzo, Esq.

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